

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 04-10248-RCL
)	
CHRISTOPHER ALVITI)	
)	

GOVERNMENT'S ASSENTED TO MOTION TO CONTINUE SENTENCING

Now comes the United States, by its attorneys, Michael J. Sullivan, United States Attorney, and David G. Tobin, Assistant U.S. Attorney, and hereby moves this Honorable Court to continue the sentencing of Christopher Alviti from December 8, 2005 to a date after the conclusion of the trial of co-defendant Richard Gould.

As grounds for support of this motion, the government avers the following: 1) Christopher Alviti pled guilty on June 1, 2005; 2) Christopher Alviti is currently under home confinement 3) Christopher Alviti entered into a plea agreement with the United States under which he is obligated to cooperate in the prosecution of his co-defendant Richard Gould; 3) the United States anticipates that Christopher Alviti will testify at the trial of Richard Gould, and 4) a hearing on a motion to suppress filed by Richard Gould is scheduled for December 7, 2005.

The government respectfully submits that postponing Christopher Alviti's sentencing until after the completion of his testimony in the Gould trial will enable the Court to fully assess Christopher Alviti's cooperation before imposing a

sentence. Similarly, a postponement will allow the government to fully assess Christopher Alviti's cooperation prior to making a sentencing recommendation to the Court. The defense assents to this motion.

Conclusion

For the reasons stated above, the United States respectfully moves this Honorable Court to allow the government's motion.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ : David G. Tobin
DAVID G. TOBIN
Assistant U.S. Attorney

